



DC  
Amateur  
Rules

WT Docket No  
98-143

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WHITESBORO, N.Y. 13492

(ADVANCED CLASS)

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OCT 22 1998

FEDERAL COMMUNICATIONS COMMISSION  
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FEDERAL COMMUNICATIONS COMMISSION  
GETTYSBURG, PA.

GENTLEMEN:

IN REGARD TO DOCKET 98-143 AND THE ARRL'S  
PETITION TO RESTRUCTURE PART 97 OF THE LAW PERTAINING  
TO AMATEUR RADIO, I WISH TO MAKE THE FOLLOWING  
COMMENTS.

I BELIEVE THAT MERELY REDUCING THE NO. OF  
CLASSES OF LICENCE FROM FIVE TO FOUR <sup>DOESN'T</sup> GOES NEARLY  
FAA ENOUGH. IT WOULD NOT BE ENOUGH TO ~~AMOUNT~~ AMOUNT  
TO ANYTHING. IF THE DAMAGE CAUSED IN THE MID 1960'S  
IS GOING TO BE UNDONE, WHAT IS NEEDED IS TO COMPLETELY  
DO AWAY WITH ALL VESTIGES OF "INCENTIVE LICENSING."

TWO CLASSES OF LICENSE WOULD BE SUFFICIENT.

1. THE PRESENT TECHNICIAN CLASS WITH VHF <sup>PRIVILEGES</sup> WOULD  
REMAIN AS IS. NO CODE REQUIRED.
2. THE GENERAL CLASS WOULD CONVEY ALL AMATEUR  
PRIVILEGES AS IT DID PRIOR TO INCENTIVE LICENSING.  
CODE SPEED REQUIRED WOULD BE FIVE WORDS PER  
MINUTE.
3. THE NOVICE LICENSE WOULD BE DROPPED. PRESENT  
NOVICES COULD KEEP THEIR LICENSES, BUT NO NEW ONES WOULD  
BE ISSUED. POWER LIMITATIONS ON NOVICES WOULD NOT APPLY  
TO GENERAL CLASS LICENSES. WHEN THEIR LICENSES  
EXPIRE THEY WOULD HAVE TO UPGRADE TO GENERAL OR  
TECHNICIAN.
4. TECHNICIAN-PLUS LICENSEES WOULD BECOME  
GENERALS.
5. ADVANCED & EXTRA CLASS LICENSEES COULD KEEP  
THEIR LICENSES & RENEW THEM, BUT NO NEW ONES  
WOULD BE ISSUED AND THEY WOULD CONVEY NO ~~FAA~~  
PRIVILEGES OVER AND ABOVE GENERAL.

I BELIEVE FIVE WPM PROVES A PERSON KNOWS THE  
CODE. HE EITHER PLANS TO USE CODE OR HE DOESN'T, AND HOW  
FAST HE CAN COPY IT WHEN TESTED WON'T CHANGE A THING.

SINCERLY Merle J. Newton

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10755 Reseda Boulevard  
Northridge, California  
91326-3132

October 3, 1998

*WT Booked 100  
22-143*

ARRL/FCC  
225 Main Street  
Newington, CT 06111

Subject: New Proposals For Amateur Radio Structure

Having read the FCC's and ARRL's proposed structure and the question of details which were not answered, not discussed, or were just plainly omitted, I think it's time to first determine our objectives and then determine how we want to get there. In other words, let's put the horse in front of the carriage!

1. The FCC wants to simplify the license structure to reduce costs.
2. The ARRL appears to want to make the hobby of amateur radio more attractive timely, insuring its continuity and popularity.
3. From the letters in QST (October '98) there appears to be at least two opinions of what amateur radio is:  
(a) I worked hard for my license and noboby is going to lower the gate to get by me; and (b) Lower the CW requirements while bringing up the technical requirements for the higher license.

I know a lot of amateurs today are not aware of the simple license plan of the 1930's. CW was 10 wpm - you had to receive 50 letters continuing correct; if you did this you got to demonstrate your ability to send at 10 WPM. When you passed this you received a technical test. (It was not T-F but included problems requiring algebra, schematics and explanations of how the circuits functioned!) If you passed, you received your license in about six weeks. Incidentally, you could - in most places - take the license test only once every three months because that's when an FCC examiner was present.

Did it work? Ask the old timers or read the old QST's to see how these 10 wmp'rs made those wpm records. Somehow we got confused or forgot that cw ability is both natural to some and, also, that practice makes perfect. Humans vary in their abilities - some copy cw very easily and well while some have great difficulty. Each will find his way if the gates are not too high.

About the technical exam, this was a difficult problem because in the 1930's many people did not have high school diplomas and algebra and equations were entirely foreign. Therefore, it required effort and diligence for these people to comprehend the tests. Many had to enlist outside help from friends, teachers, etc. in the studying process. Obviously, many succeeded.

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Why was the code speed increased to 13 wpm? It's the old story. "I have a good thing and I don't want all those dumb gooks messing up my frequency!" (Transmitters being crystal-controlled in the 30's, the number of crystals owned by the amateur was determined by his/her economic status.) While the intention may have been good, the trend to elitism was set and today we have 20 wpm. (How dumb can it get?)

How about phone operation? When you passed a basic (Class B) test you could operate on any band using CW (there was no 40 meter phone, only CW - another dumb idea) but 20 and 75 were restricted to Class "A" amateurs. To get a Class "A" license you had to have a year's experience before you took the exam. (Many stretched the truth that they were on the air when they may have had a 160-meter crystal oscillator and a converted BC (broadcast) receiver, used during the winter season.) How simple can we get?! Basic license, amateur experience, upgrade and "bingo" you can operate all frequencies with all amateur privileges!

Today we have another factor - international. We have exchange license privileges between countries so it behooves us to see that licensing is uniform between countries for the same privileges. If we know that the next IARU will be lowering CW requirements, let's not fight a battle that is a waste of time and will only impede progress. Let's be intelligent and compromise to get the best for everyone.

Incidentally, I had just missed the 10 wpm period in taking my first amateur radio test and had to take the 13 wpm test. In my experience, I did not notice a quality upgrade in the amateur operation as a result of the higher CW requirement. However, we may have lost some good potential amateurs as a result of the increased CW requirement. Let's not repeat that bad lesson!

I had a Class "A" license from 1939 on and I still think of myself as a Class "A" amateur - not "advanced" as you now designate me! The FCC/ARRL really pulled a boo-boo when they failed to recognize the value of years of operating experience on the air and down-graded the existing Class "A" license. Another elitist move. Let's not repeat that disaster!!

Your proposal for the "A" licensees to take another exam is a bad idea. Their experience is worth a lot more than a memorized tech exam. I held a First Class radio phone license while Chief Engineer for WMOH in Hamilton, Ohio - have taught in two universities - have been a staff member on the Manhattan Project, as well as Test Director on the Surveyor Space Craft Program. Just how is that additional exam going to improve my amateur abilities? Re-think your proposal and get real! We have had enough of elitism. Remember, this is a hobby and our country is a Democracy!

I have been an active amateur for over 60 years and have enjoyed many different facets of the hobby. Today, in my retirement, I remain active and healthy. Let's all work for a better amateur radio hobby for **everyone**, not just for a few!!

73 and DX



Lawrence R. Walsh - WB6NFO

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Proposal to Change Existing  
Amateur Radio Laws

By Jerry Bustin / WA7SIC & James Falkner / WA7VQO

There seems to be a lot of discussion within the Amateur Radio society about a new change to the ham radio structure.

This is our written proposal addressing some issues to the F.C.C.

The following is a comprehensive restructuring proposal for Amateur Radio Licensing for your consideration.

Our only concern is to add suggestions for streamlining Part 97 of the Amateur Radio Service Rules. We wish to make comments on amending the F.C.C. Rules to privatize further the administration of the Amateur Radio Service. We wish to simplify the licensing process and to create a true incentive inspiring citizens an easy path by which they may gain advancement within the ranks.

Eliminate the number of license classes from 6 to 4.

Eliminate the present classes which are: Novice, Technician, Technician Plus, General, Advanced, and Extra. We propose four (4) new classes called CLASS-4, CLASS-3, CLASS-2, and CLASS-1 licenses.

- 2a. TECHNICIAN to become CLASS 4.
- 2b. NOVICE and TECHNICIAN PLUS to be grandfathered to CLASS 3.
- 2c. GENERAL to be grandfathered to CLASS 2.
- 2d. EXTRA to become CLASS-1 and ADVANCED to be grandfathered to CLASS 1.

D. Structuring of the License Classes: WRITTEN EXAMINATION.

CLASS-4 to be the present NOVICE requirements.

CLASS-3 to be the present TECHNICIAN PLUS requirements.

CLASS-2 to be the present GENERAL requirements.

CLASS-1 to be the present ADVANCED requirements. (The present Extra Class requirements to be eliminated entirely.)

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E. Structuring of the License Class: CODE EXAMINATION.

CLASS-4 to be NO Code Examination.  
CLASS-3 to be FIVE (5) Words Per Minute.  
CLASS-2 to be FIVE (5) Words Per Minute.  
CLASS-1 To be TWELVE (12) Words Per Minute.

F. Frequency Allocations for Classes.

Class 4Note 1Class 3Note 2Class 2Note 3Class 1Note 33.5007.0253.6003.7003.8003.9003.9754.000  
807.0003.5257.0757.1007.1507.2007.2757.300  
4014.00014.07514.10014.15014.22514.32514.350  
20  
Note 421.00021.10021.15021.20021.30021.42521.450  
15No change.12No change except Class 4 = 28.300 through 28.600 voice.10

Notes:

Restricted to 300 Watts or less output for Class 4 only.

Restricted to 1kW on all bands for Class 3 only.

Full 2kW allowed for Class 1 and 2 only.

All class 4Æs may operate HF voice on 10 meters from 28.300 through 28.600 MHz and Class 4Æs may operate HF voice on the high end, top 25kHz of the following bands only: 15, 20, 40, 80 and 160 Meters. This gives an incentive and a taste of what theyÆre missing ð incentive to upgrade. (If we allow Class 4 the privilege in most or all areas within our HF bands then they will be able to hear stations for which they may operate if they upgrade. If not, then where is the incentive to even purchase a HF Radio. If you canÆt hear it, you will never know what you are missingà.)

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